

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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NRP HOLDINGS LLC and NRP  
PROPERTIES, LLC.

Plaintiff,

NOTICE OF JOINT MOTION TO  
MODIFY SCHEDULING ORDER  
TO EXTEND FACT DISCOVERY

-vs-

Docket No. 11-CV-472-WMS

CITY OF BUFFALO, BYRON W. BROWN,  
STEVEN M. CASEY, DEMONE A. SMITH,  
RICHARD A. STENHOUSE, BUFFALO  
JEREMIAH PARTNERSHIP FOR  
COMMUNITY DEVELOPMENT, INC.,  
CITY OF BUFFALO URBAN RENEWAL  
AGENCY, JOHN DOE 1 – 10, and  
JOHN DOE COMPANIES 1 – 5.

Defendants.

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MOVING PARTY:

Joint.

DIRECTED TO:

Joint.

DATE, TIME & PLACE OF HEARING:

To be scheduled by the Court if  
necessary. Hon. William Skretny, United  
States District Court, Western District  
of New York, 2 Niagara Square, Buffalo,  
New York.

SUPPORTING PAPERS:

Declaration of Randall D. White, Esq.,  
dated June 9, 2016 and Exhs. A (Fifth  
Amended Scheduling Order (Dkt.  
No.131) and B (Proposed Sixth Amended  
Scheduling Order) thereto.

RELIEF REQUESTED:

An Order modifying the Fifth Amended Scheduling Order (Dkt. No. 131) by providing that fact discovery in this case shall conclude on December 30, 2016; that motions to compel be filed on or before December 9, 2016; and that a further discovery status conference be conducted on a date to be scheduled by the Court.

GROUND FOR RELIEF:

Fed. R. Civ. P. 16(b).

ANSWERING PAPERS:

None.

REPLY PAPERS:

None.

ORAL ARGUMENT

None requested.

DATED: Buffalo, New York  
June 9, 2016

/s/ Terrence M. Connors

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